

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG
RESOURCES (GUINEA) SARL, and BSG
RESOURCES LIMITED,

Plaintiffs,

v.

GEORGE SOROS, OPEN SOCIETY FOUNDATIONS,
OPEN SOCIETY INSTITUTE, FOUNDATION TO
PROMOTE OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN
SOCIETY INTERNATIONAL INC., OPEN SOCIETY
POLICY CENTER, and OPEN SOCIETY FUND,

Defendants.

No. 1:17-cv-02726 (JFK) (AJP)

REPLY DECLARATION OF JAMES FITZMAURICE

I, JAMES FITZMAURICE, pursuant to 28 U.S.C. § 1746, declare as follows:

I am a member of the bar of this Court and of the law firm of Willkie Farr & Gallagher LLP, counsel for George Soros (“Soros”), Open Society Foundations (“OSF”), Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc. (“OSFI”), Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund (collectively “Defendants”). I submit this declaration in support of Defendants’ Reply Memorandum of Law In Support of Defendants’ Motion To Dismiss Plaintiffs’ Amended Complaint Or, In The Alternative, To Stay The Action, dated September 8, 2017.


1. Attached hereto as Exhibit 1 is a true and correct copy of a news article by Eli Senyor, published by YNetNews, dated August 23, 2017, titled Billionaire Steinmetz Suspected of a 6-Million Euro Bribery Cache.

2. Attached hereto as Exhibit 2 is a true and correct copy of a news article by Udi Shaham, published by The Jerusalem Post, dated August 14, 2017, titled Israeli Billionaire Arrested in International Money Laundering Probe.

3. Attached hereto as Exhibit 3 is a true and correct copy of the search results for the word mark "Open Society Foundations" from the United States Patent and Trademark Office's Trademark Electronic Search System (TESS).

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 8, 2017
New York, New York


James Fitzmaurice